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March 14, 2023

**VIA ECF**

Honorable Lorna G. Schofield  
United States District Judge  
United States Courthouse  
40 Foley Square  
New York, New York 10007

Re: *Catherine McKoy, et al. v. Trump Corp., et al.*,  
No. 18-cv-9936 (LGS) (SLC)

Dear Judge Schofield:

I am co-counsel for defendants. On March 10, 2023, Plaintiffs filed a sealing application with respect to their motion for class certification (Docket no. 529). We understand that our response thereto was due today under Your Honor's individual rule I.D.3.. Because I have been ensconced yesterday and today in expert depositions in this case per the March 8, 2023, memo endorsed order of Judge Cave (Docket no. 525), I respectfully request that we be given until Friday February 17, 2023 to submit that letter. Plaintiffs' counsel has graciously agreed to this application. This is the first request for an extension.

Thank you for your attention to this matter.

Respectfully,

/s/ Peter T. Shapiro

Peter T. Shapiro of  
LEWIS BRISBOIS BISGAARD & SMITH LLP

cc: all counsel of record (via ECF)